

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

In re:

THE FINANCIAL OVERSIGHT AND
MANAGEMENT BOARD FOR PUERTO RICO

As representative of

THE COMMONWEALTH OF PUERTO RICO, et
al

Debtors¹

PROMESA

TITLE III

No. 17 BK 3283-LTS

(Jointly Administered)

This Filing relates to PREPA

**MOTION SUBMITTING EXHIBIT A -THE SCHEDULE OF CLAIMS SUBJECT
TO THE TWO HUNDRED EIGHTY-FIRST OMBNIBUS OBJECTION (NON-
SUBSTANTIVE) OF THE PUERTO RICO ELECTRIC POWER AUTHORITY
TO MISCELLANEOUS DEFICIENT CLAIMS**

TO the Honorable United States District Court Laura Taylor Swain:

The Puerto Rico Electric Power Authority (“PREPA”), by and through the Financial Oversight and Management Board for Puerto Rico (the “Oversight Board”), as sole Title III representative of PREPA pursuant to Section 315(b) of the *Puerto Rico*

¹ The Debtors in these Title III Cases, along with each Debtor’s respective Title III case number and the last four (4) digits of each Debtor’s federal tax identification number, as applicable, are the (i) Commonwealth of Puerto Rico (the “Commonwealth”) (Bankruptcy Case No. 17 BK 3283- LTS) (Last Four Digits of Federal Tax ID: 3481); (ii) Puerto Rico Sales Tax Financing Corporation (“COFINA”) (Bankruptcy Case No. 17 BK 3284-LTS) (Last Four Digits of Federal Tax ID: 8474); (iii) Puerto Rico Highways and Transportation Authority (“HTA”) (Bankruptcy Case No. 17 BK 3567-LTS) (Last Four Digits of Federal Tax ID: 3808); (iv) Employees Retirement System of the Government of the Commonwealth of Puerto Rico (“ERS”) (Bankruptcy Case No. 17 BK 3566- LTS) (Last Four Digits of Federal Tax ID: 9686); (v) Puerto Rico Electric Power Authority (“PREPA”) (Bankruptcy Case No. 17 BK 4780-LTS) (Last Four Digits of Federal Tax ID: 3747); and (vi) Puerto Rico Public Buildings Authority (“PBA”, and together with the Commonwealth, COFINA, HTA, ERS, and PREPA, the “Debtors”) (Bankruptcy Case No. 19-BK-5523-LTS) (Last Four Digits of Federal Tax ID: 3801) (Title III case numbers are listed as Bankruptcy Case numbers due to software limitations).

Oversight Management, and Economic Stability Act (“PROMESA”)² very respectfully submit:

1. On Friday, December 11 2020, the Oversight Board through the undersigned filed the *Two-Hundred Eighty-First Omnibus Objection (Non-Substantive) of the Puerto Rico Electric Power Authority to Miscellaneous Deficient Claims*” (the “Two Hundred Eighty-First Omnibus Objection”). ECF No. 15421.

2. During the filing of the Two Hundred Eighty-First Omnibus Objection, the undersigned by mistake attached to the filing as Exhibit A a second copy of the Two Hundred Eighty-First Omnibus Objection instead of the English version of Exhibit A to the Two Hundred Eighty-First Omnibus Objection. In other words, inadvertently the 281 Omnibus was uploaded into the CM-ECF System twice.

3. The Oversight Board through the undersigned submits herewith the English version of Exhibit A to the Two Hundred Eighty-First Omnibus Objection, the English translation of the Schedule of Claims subject to the aforementioned objection.

NOTICE

4. In accordance with the Amended Omnibus Objection Procedures and the Court’s Notice Order, PREPA is providing notice of this motion to (a) the individual creditors subject to this Two Hundred Eighty-First Omnibus Objection, (b) the U.S. Trustee, and (c) the Master Service List (as defined by the Thirteenth Amended Case Management Procedures [ECF No. 13512-1]), which is available on the Debtors’ case website at <https://cases.primeclerk.com/puertorico>. The notice for of the Two Hundred Eighty-First Omnibus Objection was attached to it as Exhibit C. Spanish translations of the Two

² PROMESA is codified at 48 U.S.C. §§2101-2241

Hundred Eighty-First Omnibus Objection and all of the exhibits were attached and filed with the objection and will be served on the parties. PREPA submits that, in light of the nature of the relief requested, no other or further notice need be given.

WHEREFORE PREPA, respectfully request that the Court take note of the filing of the Exhibit A to the Two Hundred Eighty-First Omnibus Objection attached hereto to correct the mistake incurred during the aforesaid filing.

RESPECTFULLY SUBMITTED:

In San Juan, Puerto Rico, this 16th day of December 2020

IT IS HEREBY CERTIFIED that the foregoing was file with the Clerk of the Court using the CM/ECF system, which will send notification electronically to all counsel of record.

/s/ Ricardo Burgos Vargas

Ricardo Burgos Vargas

PR USDC No. 218210

A&S LEGAL STUDIO, PSC

436 Hostos Ave.

San Juan, PR 00918

Tel: (787) 751-6764

Fax: (787) 763-8260

e-mail: rburgos@adameslaw.com

/s/ Martin J. Bienenstock

Martin J. Bienenstock (*pro hac vice*)

Brian S. Rosen (*pro hac vice*)

PROSKAUER ROSE LLP

Eleven Times Square

New York, NY 10036

Tel: (212) 969-3000

Fax: (212) 969-2900

*Attorneys for the Financial
Oversight and Management Board for
Puerto Rico, as representative of the
Puerto Rico Electric Power Authority*